

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

GEORGE COLLINS and	§	
ALRIKA COLLINS,	§	
	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
	§	
v.	§	CASE NO. 22-cv-00318-Raw-Jar
	§	
STATE FARM FIRE AND	§	
CASUALTY COMPANY,	§	
	§	
	§	
<i>Defendant.</i>	§	
	§	

PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LIST

COMES NOW Plaintiffs, George Collins & Alrika Collins ("Plaintiffs"), and files Plaintiffs' Preliminary Witness and Exhibit List and would respectfully show the Court the following:

I.

WITNESS LIST

	WITNESSESES	DESCRIPTION
1.	George Collins By and through counsel of record, Terry M. McKeever OBA No. 21751 tmm@fylaw.com S. Slex Yafe OBA No. 21063 ay@fylaw.com FOSHEE & YAFFE P.O. Box 890420 Oklahoma City, Oklahoma 73189 Telephone: (405) 378-3033	Plaintiff and will have knowledge of Plaintiffs' claim and causes of action.

2.	<p>Alrika Collins By and through counsel of record, Terry M. McKeever OBA No. 21751 tmm@fylaw.com S. Slex Yafe OBA No. 21063 ay@fylaw.com FOSHEE & YAFFE P.O. Box 890420 Oklahoma City, Oklahoma 73189 Telephone: (405) 378-3033</p>	<p>Plaintiff and will have knowledge of Plaintiffs' claim and causes of action.</p>
3.	<p>Ian Rupert Ian's Enterprise 9450 SW Gemini Dr. #39525 Beaverton, Oregon 97008-7105 Telephone: (405) 622-8721</p>	<p>Plaintiffs' public adjuster who inspected the Property and will have knowledge of Plaintiffs' insurance claim, the cause of damage to Plaintiffs' property, and the reasonable and necessary costs to return the Property back to its preloss condition.</p>
4.	<p>Chad T. Williams, P.E. Valor Forensic Engineering Services, LLC P.O. Box 783 Jenks, Oklahoma 74037 Telephone: (855) 918-5111</p>	<p>Mr. Williams was retained to evaluate the fire damage to the property and has knowledge about the damage to the Property.</p>
5.	<p>Luke Hibbs The Mold Consultation 726 Northwest 69th Street Oklahoma City, Oklahoma 73116 Telephone: (405) 285-9100</p>	<p>Mr. Hibbs was retained to inspect the property for suspect areas and conditions and has knowledge about the damage to the property.</p>
6.	<p>Defendant's Corporate Representative By and through counsel of record, J. Andrew Brown John S. Gladd ATKANSON, HASKINS, NELLIES, BRITTINGHAM, GLADD & FIASCO 1500 ParkCentre Bldg. 525 S. Main Street Tulsa, Oklahoma 74103 Telephone: (918) 582-887</p>	<p>Defendant and will have knowledge of the handling of Plaintiffs' claim and Defendant's denial of the claim.</p>

	Facsimile: (918) 582-8096	
7.	Ed Young Claim Specialist P.O. Box 52257 Phoenix, Arizona 85072-2257 Telephone: (800) 331-1169 ext. 3099944715 Facsimile: (844) 236-3646	Mr. Young served as a claim specialist in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.
8.	Karla Tillberg Claim Specialist P.O. Box 106169 Atlanta, Georgia 30348-6169 Telephone: (844) 458-4300 ext. 3099944165 Facsimile: (844) 236-3646	Ms. Tillberg served as a claim specialist in this matter on behalf of Defendant and will have knowledge of the handling of Plaintiffs' claim and State Farm Fire and Casualty Company's partial denial of the claim.
9.	Any witness needed to authenticate documents.	
10.	Any witness listed by Defendant and not objected to by Plaintiffs.	
11.	Plaintiffs retain the right to supplement this list as discovery is ongoing.	

II.**EXHIBIT LIST**

Ex. No.	EXHIBIT
1.	Collins' Proof of Loss, dated July 16, 2021 (COLLINS_000055-000057)
2.	Collins' Final Request for Full Payment of Damages, dated January 10, 2022 (COLLINS_000052-000054)
3.	Fire Department Report, dated January 11, 2021 (COLLINS_000849)

4.	Letter assigning Claim to Special Investigative Unit, dated January 29, 2021 (COLLINS_000872)
5.	Decision Letter, dated February 17, 2021 (COLLINS_000883-000885)
6.	Decision Letter for Contents, dated March 23, 2021 (COLLINS_000995-001003)
7.	Photographs of Property Damage.
8.	3D Matterport of Damage to Property (accessible via link at COLLINS_000055)
9.	Chad T. Williams' inspection photographs, dated May 4, 2021 (COLLINS_000151-000169)
10.	Luke Hibbs' inspection photographs, dated June 11, 2021 (COLLINS_000333-000385)
11.	Ian Enterprise's inspection photographs of Property and Contents, dated April 23, 2021 (COLLINS_000483-000843)
12.	Wagoner County Assessor's Historical Photographs of Property in 2015 and 2017 (COLLINS_000139-000141)
13.	Ian's Enterprise, LLC Estimate, dated July 16, 2021 (COLLINS_000387-000482)
14.	Email regarding travel trailer for temporary housing, dated July 10, 2021 (COLLINS_000001028)
15.	Repurchase Invoices and Receipts (COLLINS_001020-001021, 001029-001039)
16.	Contents Cleaning Invoices and Receipts dated January 20, 2021 (COLLINS_001010-001015)
17.	Damaged Contents List, dated January 20, 2021 (COLLINS_000981-000982)
18.	Damaged Contents List, dated January 26, 2021 (COLLINS_000983)
19.	Damaged Contents List, dated January 29, 2021 (COLLINS_000984)

20.	Damaged Contents List, dated February 15, 2021 (COLLINS_000985)
21.	Damaged Contents List, dated February 18, 2021 (COLLINS_000986)
22.	Rental Agreement (COLLINS_001042)
23.	All Rent Receipts (COLLINS_001040, 001043)
24.	Certified Policy, Policy No. 36-B3-L971-9, effective from May 9, 2020 through May 9, 2021. (COLLINS_000001-000051)
25.	Chad T. Williams' Engineer Report, dated Mary 11, 2021 (COLLINS_000127-000135)
26.	Chad T. Williams' CV (COLLINS_000260-000262)
27.	Kevin Dandridge's Safety Report, from June of 2021 (COLLINS_000273- 000314)
28.	Kevin Dandridge's CV (COLLINS_000328-000330)
29.	Luke Hibbs' Inspection Report, dated June 11, 2021 (COLLINS_000331-000332)
30.	3D Matterport Diagram of Property (COLLINS_000844-000846)
31.	Attorney-Client Contract (COLLINS_001045-001047)
32.	Any exhibits listed by Defendant and not objected to by Plaintiffs.
33.	Plaintiffs retain the right to supplement this list as discovery is ongoing.

Respectfully submitted,

/s/Terry M. McKeever

Terry M. McKeever

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all parties through counsel of record pursuant to the Federal Rules of Civil Procedure on April 3, 2023 in manner described below:

via US Mail to::

J. Andrew Brown
State Bar No. 22504
dbrown@abg-oklawfirm.com
John S. Gladd
State Bar No. 12307
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ATTORNEYS FOR DEFENDANT


/s/Terry M. McKeever
Terry M. McKeever